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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Thirteenth session,
Geneva, 7-17 July 1997,
agenda item (3 (a))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Tanks (Part 3, Chapter 4.2 and 6.6)

Coding of Portable Tanks
Use of Tank Strings and/or Tank types

Transmitted by the European Portable Tank Association/
Tank Container Association (EPTA/TCA)

Justification

The EPTA and the TCA have separately and jointly discussed the use of Tank Strings as proposed by Germany (ST/SG/AC.10/R 531) and Tank Types (as in ST/SG/AC.10/R 528) as proposed by the United States of America designating portable tanks, particularly tanks for liquids.

The conclusion of these deliberations is that we could find no support for the German proposal for the tank parametric string. We could, however, find extensive support for the use of tank types.

For the generality of dangerous liquids, EPTA/TCA note the work taking place to establish a rationalised approach to assigning substances to portable tanks. EPTA/TCA believe that this work will considerably reduce the number of tank types for liquids to the extent that at most 11 or 12 tank types may be needed. This simplification lends itself to tank types more than tank strings. (EPTA/TCA welcome the 'rationalised approach' initiative.)

With respect to liquids tanks, EPTA/TCA consider it essential that a clear method should be established to show that there is an hierarchy of tanks starting with the simplest, a tank with a 1.5 bar test pressure and two closures on a bottom outlet rising to a 10 bar test pressure tank with no openings below the level of the liquid, an equivalent shell thickness of 10mm and frangible disc. It needs to be clearly understood from the method of coding tanks chosen that a substance may not be carried in a tank type of lower specification than the minimum requirements laid down for it. On the other hand, it needs to be clearly understood from the method chosen that a tank type of higher specification can be used for that substance. We do not see how this can be easily demonstrated by the tank string system whereas we contend that the tank type system can. For us in the affected industry this is an overriding argument in favour of the tank types.

We also believe that the tank type system will be more easily enforceable than the tank string system.

Proposals:

EPTA/TCA propose the adoption of a tank type system for assigning substances to portable tanks in line with the developing 'rationalised approach'.

EPTA/TCA proposes the use of the tank type system in three ways:-

1) As a mark on portable tanks in the form of a 'decal';

2) As an indication on the approval certificate of portable tanks;

3) In the relevant tables in the Recommendations.

Further Discussion.

EPTA/TCA propose that the tank type be marked in the form of a 'decal' as the tank type may change in service e.g. if it is converted from bottom outlet to no openings below the level of the liquid or e.g. due to the insertion or removal of frangible discs before the emergency pressure relief valve. A system of coding tank containers is already provided for in the ISO series of standards for Series 1 Freight Containers. The relevant standard could be amended to take account of a tank type system adopted by the Committee of Experts and EPTA/TCA are prepared to initiate the appropriate amendments.

With respect to the approval certificates, these could state that a tank meets Type zz e.g. if the frangible disc(s) are in place but only Type yy if the frangible disc(s) are removed.

Operationally, it would be the responsibility of the owner/operator to ensure that the correct tank type is displayed.

We consider that using a tank type system will make it much easier to avoid lengthy lists of substances being attached to the approval certificates as at present.

EPTA/TCA take note of the significant efforts made by both Germany and the United States of America to provide systems for the coding of tanks and would thank both countries for the work they have done.